

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEFFREY SIEGEL, Administrator of the Estate of
MOUSTAPHA AKKAD, deceased, and
MOUSTAPHA AKKAD's heirs; SOOHA
AKKAD, individually; SUSAN GITELSON,
Special Administrator of the Estate of RIMA
AKKAD MONLA, deceased, and RIMA AKKAD
MONLA's heirs, ZIAD MONLA, individually, and
on behalf of his minor sons; and MICHAEL
BUTLER

Plaintiffs,

v.

HSBC HOLDINGS PLC, HSBC NORTH
AMERICA HOLDINGS INC., HSBC USA INC.,
HSBC BANK USA, N.A., HSBC SECURITIES
(USA) INC., HSBC FINANCE CORPORATION
AND HSBC BANK MIDDLE EAST LIMITED,

Defendants.

Case No. 15-cv-10139 (JRB)

DECLARATION OF ROBIN DOUGLAS JONES

RESTRICTED

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Pursuant to 28 U.S.C. § 1746, Robin Douglas Jones hereby declares:

1. I am the Chief Operating Officer for HSBC Bank Middle East Limited ("HBME").
2. In my capacity as Chief Operating Officer for HBME, I have personal knowledge of the matters set forth herein and believe them to be true and correct based on: (a) my work for HBME, and (b) my review, or someone else's review at my direction, of relevant business records and public filings.
3. HBME is a bank headquartered and incorporated in the Dubai International Financial Center in Dubai, United Arab Emirates. HBME has its registered office in the Dubai International Financial Centre and has branch offices in the United Arab Emirates, Qatar, Bahrain, Kuwait, Lebanon and Algeria, a subsidiary in Morocco and a representative office in Libya (the latter being dormant and under liquidation).
4. HBME is not incorporated in any state in the United States.
5. HBME currently has no offices, branches or other regular place of business in the United States, and did not have any offices, branches or other regular place of business in the United States during any time relevant to this action.
6. HBME currently has no employees in the United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing to be true and correct.

Executed on 20th December 2016

Dubai, United Arab Emirates



Robin Douglas Jones
Chief Operating Officer
HSBC Bank Middle East Limited

